



## REMARKS

### Status of the Claims

Claims 1-25 are pending in this application.

Claims 1-25 are rejected.

### Rejection of Claims 1-25 Under 35 U.S.C. § 102(b)

Claims 1-25 stand rejected under 35 U.S.C. §102(b) as being clearly anticipated by U.S. Patent No. 6,000,322 by To. The Applicant respectfully traverses the 35 U.S.C. § 102(b) rejection of claims 1-25. The law is clear that anticipation requires that a single prior art reference disclose each and every limitation of the claim sought to be rejected. 35 U.S.C. § 102(b). The law is also clear that a claim in dependent form shall be construed to incorporate all the limitations of the claim to which it refers. 35 U.S.C. § 112, ¶ 4.

Applicant respectfully maintains that independent claim 1 is not anticipated by To '322 because independent claims 1, 12, and 18 disclose a die adapter system where the die has a lower die shoe with an upper surface configured to receive a lower adapter. Likewise, claim 1 also discloses an upper die shoe with a lower surface configured to receive an upper adapter. Thus, only a portion of the die is being removed and replaced in the press of the present invention. By contrast, To '322 discloses a bolster assembly which is used to remove and replace the entire die being used in the press. The Office Action referred to a lower adapter 64 and an upper adapter 40a of To '322. However, reference number 64 discloses a drive mechanism that is used to insert and remove the entire die. Col. 4, lines 47-50. Thus, the drive

mechanism 64 assist in inserting and removing the heavy dies of the molder, and it is not an adapter for attaching a portion of the die. Similarly, reference number 40a discloses a work station where a work piece is conveyed and an initial draw can be performed. Col. 7, Lines 10-12. Thus, the work station is not teaching an upper adapter where a portion of the die is attached.

In view of the foregoing, the Applicant respectfully submits that claim 1, 12, and 18 define over the art cited by the Examiner and respectfully requests withdrawal of the rejection. Likewise, claims 2-11, 13-17, and 19-25, which depend from claims 1, 12, and 18 respectfully, further define the invention and define over the art cited by the Examiner. Thus, Applicant respectfully requests withdrawal of the rejection.

Furthermore, the Applicant submits that To '322 does not render claims 1-25 obvious. The standard for obviousness is that there must be some suggestion, either in the reference or in the relevant art, of how to modify what is disclosed to arrive at the claimed invention. In addition, "[s]omething in the prior art as a whole must suggest the desirability and, thus, the obviousness, of making" the modification to the art suggested by the Examiner. *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 1051, 5 U.S.P.Q.2d (BNA) 1434, 1438 (Fed. Cir.), cert. denied, 488 U.S. 825 (1988). The Applicant respectfully submits that To '322 does not teach or suggest the use of an upper die assembly and a lower die assembly in order to insert and remove only a portion of the die from the injection molder. To '322 illustrates the considerable weight of the dies being removed by including 12 wheels on the bolsters 262 to distribute the weight. Col. 10, Lines 7-11. To '322 also discloses that removing and loading the dies can take considerable time. Col. 7, Lines 28-30. The present invention overcomes these disadvantages by having an upper die shoe and a lower die shoe so that only a small part of the die is being loaded and removed. Thus, the time to load and remove

the die is greatly reduced, since the portion being replaced in the present invention is much lighter than the die being replaced in To '322. Therefore, the Applicant respectfully submits that To does not render claims 1-25 obvious and request allowance of the claims.

### **CONCLUSION**

It is respectfully submitted that in view of the above amendments and remarks the claims 1-25, as presented, are patentably distinguishable because the cited patents, whether taken alone or in combination, do not teach, suggest or render obvious, the present invention. Therefore, Applicant submits that the pending claims are properly allowable, which allowance is respectfully requested.

The Examiner is invited to telephone the Applicant's undersigned attorney at (248) 364-4300 if any unresolved matters remain.

Respectfully submitted,

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Dated: November 23, 2005

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